EXHIBIT 19

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

DEC 1 1 2003

Reply To
Attn Of: WCM-121

RECEIVED
DEC 1 6 2003
RCI

Peter Wold
RCI Environmental, Inc.
P.O. Box 1668
Sumner, WA 98390

Re: Approval of Control Well Selection, and Comments regarding Draft Rhone Poulenc Barrier Wall Evaluation Report, August 2003
Administrative Order on Consent for Corrective Action ("Order")
Under the Resource Conservation and Recovery Act ("RCRA")
Docket No. 1091-11-20-3008(h)
Rhone-Poulenc Inc. Marginal Way Facility ("Facility")
WAD 00928 2302

Dear Mr. Wold:

The U. S. Environmental Protection Agency, Region 10 ("EPA") has completed its review of the "Draft Rhone Poulenc Barrier Wall Evaluation Report" ("the draft Report") submitted September 12, 2003.

The draft Report proposes use of MW-8 (outside shallow well) and MW-49 (inside shallow well) for the purposes of comparing differential water levels to control the pumping rates. The Report also proposes to use the updated running averages for the inward gradient criteria comparison. These proposals are hereby approved.

The draft Report provides the evaluation required by the work plan, and the material and data are summarized well. In accordance with Section VII of the Order, EPA is providing the Respondents with the following comments regarding the draft Report:

1. Page 2. The permeability for the aquitard is given as a "gallon per minute," but it is not clear over what area that would occur. Is that implying over the entire inside footprint of the barrier wall enclosure, or over some smaller area? How is that value related to the increase in water level documented at the site? Please elaborate with more details about the area over which this aquitard permeability exists.

2. Figure 2-1. It would be helpful if there were some notes added regarding the wells which had some peculiar problem during the water level measurements, as described in the text on pages 6 and 7.

3. Table 3-1. The table should be redone with different shading. As presented, the copied table is difficult to read through the highlighting.

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4. Figure 3-4. The figure is well done, and summarizes much information. However, the graphs of the wells could use a vertical gradient direction arrow (scaled vectors) to make the graphs easier to read at a glance. As presented it is hard to determine which groups of wells within the upper aquifer have an upward gradient, and which ones a downward one, until each graph (with little font and symbols) is read in detail. EPA suggests two arrows indicating vertical gradients next to each graph, one adjacent to the inside well plots and one adjacent to the outside well plots. This may be useful for mapping information if the vectors remain stable based upon additional readings taken in the future.

5. The monthly and quarterly water level monitoring must be revised to include monitoring water levels in the wells in the deeper aquifer. The purpose of this additional measurement is to document whether there is a continuing upward gradient from the lower aquifer to the upper aquifer. The present data does not include any water elevations which document whether the changes in the upper aquifer (due to construction of the barrier wall) has altered the lower aquifer's historically upward gradient.

A revised Report which addresses the above comments must be submitted within thirty (30) days of your receipt of this letter.

Please contact me at (206) 553-8506, or have your counsel contact Jennifer MacDonald at (206) 553-8311, if you have any questions regarding these comments.

Sincerely,

Christy Brown

Christy Brown
Project Manager
Office of Waste and Chemicals Management

cc: B. Maeng, Ecology NWRO
G. Baker, NOAA
R. Brown, Marten & Brown
C. Blumenfeld, Perkins Coie
G. DuPuy, Geomatrix Consultants